

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

In re:)	Case No: 24-40877
)	
Gloria Lynn Broyles,)	Chapter 13
)	
Debtor.)	Hearing Date: 09/26/2024
)	Hearing Time: 11:00 a.m.
)	Location: 7N

MOTION TO APPROVE SETTLEMENT CONTROVERSY

THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE BY 09/19/24. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. THE DATE IS SET OUT ABOVE. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEYS.

COMES NOW Debtor, by and through Debtor's undersigned Counsel, and states to the Court as follows:

1. Debtor filed this Chapter 13 Bankruptcy case in good faith on 03/15/2024.
2. Debtor Gloria Lynn Broyles had a personal Injury claim arising from the Slip and Fall accident on 4/19/16 at Walmart ("Personal Injury Claim").
3. Debtor hired OTT Law Firm, LLC to handle the Personal Injury Claim. On July 11, 2024 following a 4 day trial by jury, verdict was entered in the amount of \$900,000.00 in favor of Gloria Broyles. That amount was reduced 50% due to a finding a comparative fault.
4. Attorney has settled Debtor's claim for \$450,000.00 minus the following expenses of \$1,94,163.10:
 - a. Attorney's Fee: **\$180,000.00**

b. Case Expenses: **\$14,163.10**

Third Party Payments

a) Orthopedic ASC of Chesterfield	\$9,404.34
b) Pain and Rehab Specialist (United Physician Group)	\$8,193.60
c) The Orthopedic Center of St. Louis	\$13,626.00
d) SSM DePaul	\$240.00
e) The St. Louis Spine and Orthopedic Surgery Center	\$50,792.08
f) MRI Partners of Chesterfield	\$6,794.80
g) Home Care Chiropractic	\$2,014.40
h) CT Partners of Chesterfield	\$3,880.40
i) MFG Spine LLC	\$30,527.91
j) Naseem A. Shekhani M.D. PC	\$1,327.20
k) Greater MO Imaging	\$1,356.00
l) Precision Medical Products, Inc.	\$747.70
Total:	\$128,904.43

Leaving **\$126,932.47** to be paid to the Debtor

WHEREFORE, Debtor prays for an Order of this Court.

Granting Debtor's Motion to Approve the Settlement/Compromise Controversy.

To Further Order that the Debtor's portion of the settlement proceeds shall be turned over to the Trustee to be held pending further order of this court.

RESPECTFULLY SUBMITTED,
A&L Licker Law Firm, LLC

By: /s/ Tobias Licker
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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the **Foregoing Document** was filed electronically on 8/19/2024, with the United States Bankruptcy Court, and has been served on the parties in interest via e-mail by the Court's CM/ECF System as listed on the Court's Electronic Mail Notice List.

I certify that a true and correct copy of the **Foregoing Document** was filed electronically with the United States Bankruptcy Court, and has been served by Regular United States Mail Service, first class, postage fully prepaid, addressed to those parties listed on the Court's Manual Notice List and listed below on 8/19/2024.

/s/ Saloni Mehta

Diana S. Daugherty
Chapter 13 Trustee
P.O. Box 430908
St. Louis, MO 63143

Office of the US Trustee
111 S Tenth St, Ste 6.353
St. Louis, MO 63102-1127

Joseph Ott
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